



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/RMP/ADR/AS
F. #2021R00600

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 6, 2025

By E-mail

Kenneth Abell
Jarrod L. Schaeffer
Abell Eskew Landau LLP
256 Fifth Avenue, 5th Floor
New York, NY 10001

Seth DuCharme
Nicole Boeckmann
Bracewell LLP
31 W. 52nd Street, Suite 1900
New York, NY, 10019-6118

Re: United States v. Sun, et al.
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

Pursuant to Title 18, United States Code, Section 3500, the government hereby provides the enclosed material related to the subject matter of anticipated testimony of government witnesses at the upcoming trial in the above-referenced case. This letter will be accompanied by a link to the secure download of the materials.

Some 3500 material was included in prior Rule 16 productions. As a courtesy, the government endeavored to identify and include within this 3500 production emails and other statements that were previously produced to you in Rule 16 discovery. These reproduced 3500 materials bear the bates numbers previously produced to you.¹ Please note, however, that the government did not include and reproduce as 3500 any materials from electronic devices, email

¹ The government conducted a reasonable search and review of its productions to provide these reproduced 3500 materials, and any omissions are inadvertent. The government will not be reproducing additional 3500 materials from any future Rule 16 productions. The government will continue to produce on a rolling basis 3500 that is not produced as Rule 16 as it becomes available.

accounts, and iCloud accounts that were previously provided in Rule 16 discovery either as responsive reports, full forensic extractions, or both.

The government does not concede the relevance, materiality, or admissibility of the information disclosed herein.

Very truly yours,

JOSEPH NOCELLA, JR.
United States Attorney

By: /s/
Alexander A. Solomon
Robert M. Pollack
Andrew D. Reich
Amanda Shami
Assistant U.S. Attorney
(718) 254-7000